



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

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REMEDATION AND REDEVELOPMENT DIVISION

INTERNET: www.michigan.gov/deqrrd

INFORMATION BULLETIN

CENTRAL CITY PARK Westland, Wayne County November 2006

INTRODUCTION

The purpose of this bulletin is to inform area residents about the presence of lead contamination at Central City Park (Park). This Informational Bulletin is provided by the Remediation and Redevelopment Division (RRD) of the Michigan Department of Environmental Quality (DEQ).

SITE OVERVIEW

Wayne County owns this property and used it to dispose of catch basin cleanings and street sweepings between the 1930's and 1970's. This debris is believed to contain lead from leaded gasoline used during that time. Since that time, the property has been leased by the city of Westland and operated as a public park.

RRD-DEQ first learned of the contamination at the Park on December 23, 2002, when a Remedial Action Plan (RAP) was submitted to the DEQ by Wayne County. In the RAP, the County proposed to dig up the lead contaminated soil above direct contact criteria, consolidate it, and place a cap of clean soil over the area. The RAP was insufficient – it incorrectly identified 1,500 ppm as the direct contact level for lead, and did not determine the extent of lead contamination -- and was denied by the DEQ on May 7, 2003.

Since that time, the DEQ has been working with Wayne County and city of Westland officials to bring about an appropriate response to the conditions at the Park. DEQ has reviewed several workplans and provided sampling guidance to Wayne County.

DEQ currently is waiting for results from recent sampling conducted by Wayne County. Once these results are available, DEQ, Wayne County and city of Westland officials will continue to identify the most appropriate approach to the necessary cleanup actions.

CLARIFICATION OF KEY INFORMATION

Recent communications appear to reflect an incomplete understanding of some important facts about this site. The following is offered to clarify these points:

- Lead is the only contaminant at the Park that exceeds residential direct contact criteria (*see glossary*). Other contaminants discussed in the press (cyanide, mercury, pesticides, PCB's) are present only at trace levels, well below residential direct contact criteria.
- Only two samples, from a small area west of the walking path in the woods, exceed residential direct contact criteria for benzo(a)pyrene. The source of this contaminant is unknown but it is believed to be present in only a limited area.
- Arsenic, while present in some samples, is below the direct contact criteria of 14 ppm used for Wayne County. (Arsenic is known to be naturally occurring at this level in soils throughout Wayne County).
- Wayne County is responsible for the remediation of the property both as owner and as the entity that caused the contamination. The City of Westland is obligated to protect the public from harmful exposures on the property ("Due Care" obligations).
- Available information shows that the Park was not a "landfill" but was used for depositing debris on the soil surface.
- The current Michigan residential direct contact criterion for lead is 400 ppm. The direct contact criterion for lead at industrial or commercial properties is 900 ppm. Of the approximately 180 samples collected from the Park, seven samples

are above 900 ppm. Of these seven, one is 2,100 ppm, the other six range between 992 ppm and 1,232 ppm.

- Fifteen samples were collected from the playscape area. One sample only (not two as reported) had lead above residential direct contact levels. Based on the samples (one out of fifteen) the DEQ does not consider this an exposure risk.
- Contrary to recent reports, Wayne County has in fact submitted two remediation proposals (cleanup plans) to the DEQ:
 - The first cleanup plan was submitted in the RAP dated December 23, 2002 and was denied by the DEQ on May 7, 2003.
 - The second cleanup plan was submitted in writing on April 17, 2006. The DEQ responded on May 22, 2006 denying the proposal because the extent of lead contamination at the Park had not been adequately characterized.

CURRENT STATUS

Wayne County and city of Westland officials have committed to meet with the DEQ in December 2006 to reach an expeditious resolution of remaining technical issues so that an appropriate response to the lead contamination at the Park can be identified. Wayne County and city of Westland officials plan to identify the selected remedial action by years end and to expedite implementation of the selected remedial action.

FUTURE DEQ ACTIONS

The DEQ remains committed to work with Wayne County and the city of Westland to assist them in determining the most appropriate means of accomplishing the cleanup that must be performed at the Park. The DEQ will continue to provide oversight and guidance as the development and implementation of cleanup plans proceed.

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GLOSSARY

Residential Direct Contact Criteria: Identifies a soil concentration that is protective against adverse health effects due to long-term ingestion of and dermal (skin) exposure to contaminated soil for residential land uses.

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